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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**GOOGLE LLC'S SUBMISSION RE: P23
IN RESPONSE TO DKT. 450-1**

Referral: Hon. Susan van Keulen

Pursuant to Dkt. 450-1, Google hereby provides the following information the Court requested:

(1) “[t]he total number of persons it has identified in its initial disclosures, including supplements”

Google disclosed five employees in its September 8, 2020 initial disclosures. In its February 21, 2022 amended disclosures, Google removed the names of two individuals previously disclosed, and added seven additional individuals, for a total of ten individuals.¹

(2) “[a]n explanation of Google’s ‘February 4, 2021 production of lists of relevant teams,’ including an exemplar”

On September 30, 2020, Plaintiffs propounded their First Set of Requests for Production (Nos. 1-19), including the following two Requests:

REQUEST FOR PRODUCTION NO. 11: Documents sufficient to identify Google’s current and former officers, directors, managers, employees and consultants with knowledge of the alleged Google conduct.

REQUEST FOR PRODUCTION NO. 12: Documents sufficient to show the roles and responsibilities of and supervisory relationship between Google’s current and former officers, directors, managers, employees and consultants with knowledge of the alleged Google conduct.

Google agreed to produce “documents sufficient to identify current Google personnel with responsibility for the relevant conduct relating to Google Chrome, Google Analytics, and Google Ad Manager” (Request No. 11) and “documents sufficient to show the roles of current Google personnel with responsibility for the relevant conduct relating to Google Chrome, Google Analytics, and Google Ad Manager” (Request No. 12). On February 4, 2021, Google produced a list of relevant teams and team members in accordance with its proposed compromise in order to resolve Request Nos. 11 and 12, which is attached as Exhibit A (GOOG-BRWN-00023909).

The February 4, 2021 list identifies 226 Google employees. For each relevant team member, Google identified their name, organizational division, name of manager, and title. Notably, both Steve Ganem and George Levitte are identified as relevant team members as well as managers of relevant team members.

¹ Google removed Keith Enright and Dan Stone (a former employee) from its amended disclosures.

1 DATED: March 2, 2022

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